

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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SUPERB MOTOR, INC., TEAM AUTO SALES LLC, ROBERT ANTHONY URRUTIA, 189 SUNRISE HIGHWAY AUTO, LLC., NORTSHORE MOTOR LEASING, LLC., BRIAN CHABRIER, individually and derivatively as member of NORTSHORE MOTOR LEASING, LLC., JOSHUA AARONSON, individually and derivatively as a member of 189 SUNRISE HWY AUTO, LLC., JORY BARON, 1581 HYLAN BLVD AUTO, LLC., 1580 HYLAN BLVD AUTO, LLC., 1591 HYLAND BLVD AUTO, LLC., 1632 HYLAN BLVD AUTO, LLC., 1239 HYLAN BLVD AUTO, LLC., 2519 HYLAND BLVD AUTO, LLC., 76 FISK STREET REALTY, LLC., 446 ROUTE 23 AUTO, LLC., and ISLAND AUTO MANAGEMENT, LLC.,

Plaintiffs,

-against-

ANTHONY DEO, SARAH DEO, HARRY THOMASSON, DWIGHT BLANKENSHIP, MARC MERCKLING, MICHAEL LAURIE, THOMAS JONES, CPA, CAR BUYERS NYC, INC., GOLD COAST CARS OF SYOSSET, LLC., GOLD COAST CARS OF SUNRISE, LLC., GOLD COAST MOTORS AUTOMOTIVE GROUP, LLC., GOLD COAST MOTORS OF LIC, LLC., GOLD COAST MOTORS OF ROSLYN, LLC., GOLD COAST MOTORS OF SMITHTOWN, LLC., UEA PREMIER MOTORS CORP., DLA CAPITAL PARTNERS, INC., JONES, LITTLE & Co., CPA'S, LLP., FLUSHING BANK, LIBERTAS FUNDING, LLC, and J.P. MORGAN CHASE BANK, N.A.

Defendants.

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Case No. 2:23-cv-6188  
(JMW)

**REPLY DECLARATION  
OF BRIAN M. LEVINE,  
ESQ. IN FURTHER  
SUPPORT**

Brian M. Levine, Esq., declares, pursuant to 28 U.S.C. § 1746, under penalty of perjury, that the following is true and correct:

1. I am admitted to practice before this Court, and am a partner of Levine Singh, LLP, attorneys for Defendants Anthony Deo, Sarah Deo, Harry Thomasson, Dwight Blankenship, Marc Merckling, Michael Laurie, Car Buyers NYC, INC., Gold Coast Cars of Syosset, LLC., Gold Coast Cars of Sunrise, LLC., Gold Coast Motors Automotive Group, LLC., Gold Coast Motors Of LIC, LLC., Gold Coast Motors of Roslyn, LLC., Gold Coast Motors of Smithtown, LLC., UEA Premier

Motors Corp (the “Defendants” or “Deo Defendants”) in the instant action, and as such, I am familiar with all the facts and circumstances heretofore had herein based upon my personal knowledge and a review of the file maintained by my office.

2. I respectfully submit this Reply Declaration in Further Support of the Deo Defendants’ letter motion seeking to hold Plaintiffs, Superb Motors, Inc, Robert Anthony Urrutia, and Team Auto Sales, LLC (collectively, the “Superb Plaintiffs”) in contempt of the preliminary injunction order issued by the Honorable Orelia E. Merchant on September 29, 2023.

3. Attached hereto as **Exhibit A**, is a true and correct copy of certified records from the New York Department of Motor Vehicles (“DMV”) that were received on March 25, 2024, in response to a FOIL request served on the DMV on March 4, 2024.

4. Attached hereto as **Exhibit B**, are true and correct copies of the certified MV-50 forms previously submitted as Exhibit A, now provided for the Court's convenience with the alleged "supplemental assignment of ownership and/or bill of sale" (“Supplemental Assignments”) documents filed by the Superb Plaintiffs in the Declaration of Bruce Novicky in Opposition to the Deo Defendants' Letter Motion for Contempt (ECF [155-1](#)). To further assist the Court, the MV-50 forms are organized to correspond with the list of vehicles as detailed in Paragraphs 13 and 16 (incorrectly referred to as “14”) of the Declaration of Anthony Deo in support of the letter motion (ECF [152-1](#)). To the extent that Superb Plaintiffs produced an alleged Supplemental Assignment for which no MV-50 record exists – Vehicle #s 21 and 27 – those Supplemental Assignments were included individually.

I declare under penalty of perjury that the foregoing is true and correct. Executed on March 25, 2024.

/s/ Brian M. Levine, Esq.  
Brian M. Levine, Esq.